



# United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington, D.C. 20240



IN REPLY REFER TO:  
FWS/DMA/TRE 2-06v.2.

September 20, 2002

Mr. Willem Wijnstekers  
Secretary General  
CITES Secretariat  
15, chemin des Anémones  
CH 1219 CHATELAINE-Genève  
Switzerland

VIA FACSIMILE: (4122) 797 3417

Dear Mr. Wijnstekers:

In Notification to the Parties No. 2002/039, the Secretariat transmitted information regarding the registration of an operation that breeds Appendix-I species in captivity for commercial purposes.

The registration application was submitted by the Management Authority of the United Kingdom of Great Britain and Northern Ireland for the registration of a captive-breeding operation for green turtle (*Chelonia mydas*). We have reviewed the application for registration of Cayman Turtle Farm (1983) Ltd., in the Cayman Islands, British West Indies, as a commercial captive-breeding operation for the green turtle. The United States opposes the registration of this operation because we have determined that sufficient information has not been provided to meet the requirements set forth in Resolutions Conf. 10.16 (Rev.) and Conf. 8.15.

Our main concern about this operation is the lack of documentation of legal acquisition of the parental stock. Between 1968 and 1978, nearly half a million wild turtle eggs were collected from Costa Rica, Suriname, Guyana, and Ascension Island to be used as founder stock at the facility, along with over 200 subadults and adults. We note that these are minimum numbers, which cannot be fully documented by the proponent. We further note that some of these imports into the Cayman Islands continued after the species was placed in Appendix I (1977), although before the Convention entered into force for the Cayman Islands (1979). However, as acknowledged by the applicant, "...no receipts or permits are presently available to support the legitimacy of these activities." No other documentation (e.g., letters of acknowledgment from the countries of origin) is provided, as required in paragraph 4.b) of Annex 1 of Resolution Conf. 8.15. We therefore are unable to support the approval of this operation because it does not meet the bred-in-captivity criteria of Resolution Conf. 10.16 (Rev.), specifically paragraph b)ii)A., which requires that the breeding stock must have been established "in accordance with CITES and relevant national laws." Approval of this operation in the absence of documentation of legal

origin of its stock could potentially set a bad precedent for approving other captive-breeding operations that similarly lack such documentation.

We are also concerned about the information provided on the loss of animals from the facility during Hurricane Michelle in 2001, as well as the deliberate release of animals into the wild. Resolution Conf. 8.15, in paragraph d) under “RESOLVES,” states that “prior to establishment of captive-breeding operations for exotic species, a study of ecological risks should be completed, in order to prevent any negative effects on the ecosystem and native species.” Although the green sea turtle is not an exotic species in the Cayman Islands, the escape or release of animals from the facility could potentially pose certain ecological risks as well as risks to the species.

We are also concerned about the reported diseases occurring in the facility and the potential for spread of these diseases to wild populations through the release of animals from Cayman Turtle Farm. Releases of animals from the facility should be curtailed as long as pathogen-caused diseases are known to occur at the facility, and only cautiously with adequate disease screening thereafter and in consultation with international sea turtle experts. The facility should also have contingency plans for securing their turtles during hurricanes to prevent a repeat of the events of Hurricane Michelle. The brief description of redevelopment plans and diagrams provided in the proposal is not sufficient to determine with any degree of confidence that turtles would not again be swept out to sea in another hurricane, although we understand that the new facility is set back farther from the water’s edge.

Thank you for providing us with the opportunity to comment on the proposal.

Sincerely,

/s/ Kurt A. Johnson  
for Robert R. Gabel, Chief  
Division of Scientific Authority

/s/ Andrea Gaski  
for Peter O. Thomas, Chief  
Division of Management Authority